

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL

32212-000
19.01.00.0026

NORTHEAST DISTRICT

3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

March 23, 1988

CERTIFIED RETURN RECEIPT

Captain William J. Green, Jr., USN
Commanding Officer
Naval Air Station
Jacksonville, Florida 32212-5000

Dear Captain Green:

Warning Notice No. NE-W-16-4832
U. S. Naval Air Station Jacksonville
DER/EPA ID NO. FL6 170 024 412
Duval County - Hazardous Waste Enforcement

The Department has reviewed the documents titled "Results of Hydrogeologic Evaluation and Appendix IV Sampling Industrial Wastewater Treatment Plant," December 1987 and "Plan of Action, Delineation of Impacted Groundwater at the Industrial Wastewater Treatment Plant," January 1988. These documents were submitted in order to bring your facility into compliance with the violations of Hazardous Waste Operation permit No. HO 16-119108 as alleged in Warning Notice No. NE-W-16-4441, issued October 15, 1987.

Specific Conditions 46a and 46c of the Operation Permit have not been completely addressed by these documents. The attached memo outlines the deficiencies which were noticed. In summary, specific constituents were detected which must be added to the next quarterly sampling event. The proposed groundwater protection standards are not acceptable as presented. If Alternate Concentration Limits are desired they must be proposed in accordance with the provisions of 40 CFR 264.94.

The Plan of Action is assumed to supercede the plume delineation actions proposed in the December, 1987 submittal and should be implemented immediately. Once the EM survey is performed and the wells installed, a detailed well installation report, as outlined in the memo should be submitted.

Specific condition 46c required a corrective action plan to be submitted within 45 days of detection of contamination for remediation of the contamination plume. To date, this plan has not been submitted. Realistically, a detailed plan cannot be submitted until the plume has been delineated. However, a conceptual plan can be developed to evaluate remedial technologies and remedial alternatives in order to identify the most environmentally sound and effective remedial action to achieve cleanup of the site.

Failure to comply with permit conditions is a violation of Section 403.161, Florida Statutes. Pursuant to the Memorandum of Agreement between the United States Environmental Protection Agency and the State of Florida, missed permit compliance schedule dates result in a Warning Notice as was issued to your facility in October, 1987. The second and any subsequent letters addressing deficient compliance schedule submittals are treated as Class I violations with a Warning Notice followed by formal enforcement action through a Consent Order, which includes penalties for non-federal facilities, or issuance of a Notice of Violation (NOV).

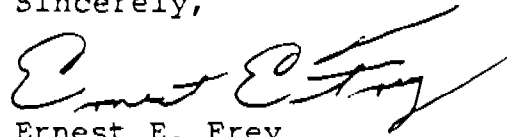
The Department prefers to handle these matters by entry into a mutually agreeable Consent Order with you as signatory for your facility. The Consent Order will include a schedule for submitting the information necessary for compliance with the permit conditions. The following schedule will be included. The Plan of Action as proposed in January, 1988 should be implemented immediately and a final report submitted by May 31, 1988. The conceptual design plan for evaluating remedial technologies should be submitted by April 30, 1988 and the final, detailed design plan for remediation submitted by June 30, 1988.

Your facility documented groundwater contamination prior to issuance of the operation permit, therefore, these plans were due by July 31, 1987. Unless there are extremely unusual circumstances, the Department will not grant extensions of time beyond the above-mentioned dates for submittals.

If we cannot negotiate a Consent Order promptly, an NOV will be issued. Pursuant to Florida Administrative Code Rule 17-4.070(6) no permit for operation shall be issued for an installation for which a notice of violation has been issued until such time as the installation is in full compliance with the law and Department rules. Issuance of an NOV will jeopardize the modification of your current operation permit, to include the operation of your hazardous waste storage facility at Building 144.

The Consent Order will be sent to you as soon as possible. Please respond to this Notice, in writing, within seven days outlining your intentions in this matter. If you have any questions please contact Elizabeth Merrill, of the Enforcement Section, at the letterhead address or telephone number.

Sincerely,

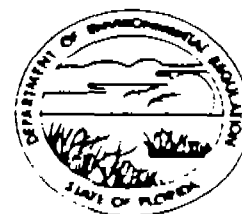


Ernest E. Frey
District Manager

EEF:emm
EEF:emm

cc: Captain A. C. Valenti, Public Works- NAS - Jacksonville
Greg Benjock, Naval Facilities Engineering Command - Charleston
Satish Kastury - DER Tallahassee
James Scarbrough, EPA Region IV

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

For Routing To Other Than The Addressee

TO: Ashwin Patel
District Engineer, Jacksonville

THROUGH: Satish Kastury
Environmental Administrator
Hazardous Waste Permitting

FROM: Merlin D. Russell, Jr.
Environmental Specialist
Hazardous Waste Permitting

DATE: February 26, 1988

SUBJECT: Naval Air Station, Jacksonville FL6 170 024 412, Operating Permit
H016-119108: Results of Hydrogeologic Evaluation and Appendix IX
Sampling Industrial Wastewater Treatment Plant, Naval Air Station,
Jacksonville, December 1987, and Plan of Action, Delineation of
Impacted Groundwater at the Industrial Wastewater Treatment Plant,
Naval Air Station - Jacksonville, January, 1988.

NORTHEAST DISTRICT
RECEIVED
MAR 1 1988
DEPT. OF ENVIRONMENTAL REGULATION
DER-JACKSONVILLE

I have read and reviewed the subject documents with respect to the requirements of the operating permit, and requirements of 40 CFR Part 264 Subpart F groundwater monitoring requirements. These documents have been sent to the UIC and Technical Support staff for their review and comments (January 26 and February 16, 1988, respectively) which are forthcoming.

The following table summarizes results of the Appendix IX analysis:

Values in ppb			Duplicate			
<u>Inorganics</u>	<u>NAS4-4</u>	<u>NAS4-5</u>	<u>NAS4-5</u>	<u>NAS4-9</u>	<u>NAS4-10</u>	<u>NAS4-11</u>
Barium	50	-	50	50	40	66
Cadmium	-	40	50	-	-	-
Chromium	-	-	72	-	-	-
Nickel	-	7900	8400	-	-	-
Sulfide	-	12000	11000	-	-	-
Vanadium	-	180	180	-	-	-
Zinc	-	48	57	-	-	-
<u>VOCs</u>						
Chloroform	13	-	-	-	-	-
Methylene chloride	-	1250	1083	-	-	-
Toluene	-	11	7	-	-	-
1,1,1-Trichloroethane	-	14	11	-	-	-
1,1-Dichloroethane	-	43	40	-	-	-

ACID EXTRACTABLES

o-cresol	-	50	60	-	-	-
phenol	-	326	340	-	-	-

- = Below Detection Limits

The new constituents must be added to the next quarterly sampling event (for the background well and all four point of compliance wells) which should be around March, 1988. Please notify the facility of this as soon as possible. These new parameters and concentration limits should be added to the Groundwater Protection Standard in the operating permit as follows:

Hazardous constituents detected pursuant to Specific Condition 44b.

Sulfide	Background*
Vanadium	Background*
Zinc	0.05 mg/l
Chloroform	Background*
Methylene Chloride	Background*
Toluene	Background*
1,1-dichloroethane	Background*
o-cresol	Background*
phenol	Background*

The proposed concentration limits for these constituents (Table 3 of the Hydrogeologic Evaluation) are not acceptable although the facility does have the option to propose Alternate Concentration Limits (ACLs) in accordance with 40 CFR 264.94.

The Plan of Action appears to supersede the recommendations in the December submittal (page 25). I concur with the facility's approach, i.e. perform an EM survey prior to selecting sites for well installation. Although the EM survey may be successful at detecting the metals and other dissolved solids, the facility must also take into consideration the VOCs and acid extractables, which are present, prior to well installation.

Once these shallow and deep assessment wells are installed, the facility must submit a detailed well installation report to the Department. Attachment A is a checklist of items that should be included in the report: every item in this checklist may not be required at this site.

After the wells are installed they should be sampled for the following constituents:

- 40 CFR Part 261 Appendix VII parameters: complexed cyanide, cadmium, hexavalent chromium and nickel
- the fourteen constituents detected in the Appendix IX analysis
- specific conductivity, pH, TOX and TOC

Memo to Mr. Patel
February 26, 1988
Page Three

It should be noted that Specific Conditions 46a and 46c of the Operating Permit have not been completed. These require plume delineation (which is currently being proposed) and submittal of a corrective action program (not even a conceptual corrective action plan has been submitted). Realistically, the facility cannot be expected to submit a detailed corrective action plan until the plume of contamination has been delineated. However, a preliminary or conceptual corrective action plan could have been submitted along with a schedule projecting phases of the plume identification and corrective action.

If you should have any questions, call me at SUNCOM 278-0130.

MDR/do
Attachment

cc: Jim Scarbrough, EPA Region IV w/attachment A
Raoul Clarke, BWP&R w/attachment A
Don Kell, UIC & TSS w/attachment A

FACILITY _____ FEDERAL I.D. NO. _____ PATS NO. _____

REF. NO	PAGE		COMP.	INCOMP.	COMME
		b. Description of wells i. Location ii. Casing material iii. Compatibility of material with wastes iv. Diameter v. Surface elevation msl vi. Length of stick-up vii. Casing length viii. Hole depth ix. Screen slot size x. Screened interval xi. Screened in compatible materials xii. Type of gravel pack around screen xiii. Size of gravel pack xiv. Type of annular seal [§264.97(c)] xv. Length of annular seal xvi. Material used to seal the annulus above the seal xvii. Surface seal xviii. Protective devices xix. Locks present? xx. Installation procedures xxi. Drilling method xxii. Drilling fluids used xxiii. Methods for installing materials in annulus xxiv. Well development procedures xv. Detailed lithologic logs A. Lithology of each unit B. Sieve analysis of each unit C. Geochemistry of each unit D. Date of boring E. Method of boring F. Qualified geologist or geotechnical person responsible for oversight of boring G. Designation of boring (number) H. Type of sampling device (shelby tube, split barrel, etc.) I. Location map			

FACILITY _____

FEDERAL I.D. NO. _____

PATS NO. _____

REF. NO	PAGE		COMP.	INCOMP.	COMPL
		<p>xxvi. Test borings</p> <p>A. Lithology of each unit</p> <p>B. Sieve analysis of each unit</p> <p>C. Geochemistry of each unit</p> <p>D. Date of boring</p> <p>E. Method of boring</p> <p>F. Qualified geologist or geotechnical person responsible for oversight of boring</p> <p>G. Designation of boring (number)</p> <p>H. Boring location map</p> <p><u>C. Sampling Methods and Procedures</u></p> <p>i. Procedures for determining groundwater levels §264.97(f)</p> <p>ii. Procedures for checking depth of well</p> <p>iii. Well purging procedures and equipment</p> <p>iv. Method used to determine completion of purging</p> <p>v. Types of equipment used for well purging</p> <p>vi. Parameters for sampling</p> <p>vii. Description of analytical methods §264.97(d)</p> <p>viii. Types of containers used for sampling</p> <p>ix. Labels for containers</p> <p>x. Equipment used for sampling & compatibility with waste types §264.97(d)(1)</p> <p>xi. Procedures for decontaminating purge equipment</p> <p>xii. Procedures for decontaminating sampling equipment</p> <p>xiii. Sample preservation methods §264.97(d)(2)</p> <p>xiv. Shipment procedures §264.97(d)(2)</p> <p>xv. Chain-of-custody procedures §264.97(d)(4)</p> <p>xvi. Procedures for annual determination of uppermost aquifer flow rate and direction</p>			